

Exhibit N

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON)
TALCUM POWDER PRODUCTS)
MARKETING SALES)
PRACTICES, AND PRODUCTS) MDL NO.16-2738 (FLW) (LHG)
LIABILITY LITIGATION)
-----)

VIDEO-RECORDED DEPOSITION OF
WILLIAM E. LONGO, PH.D.

February 5, 2019

10:24 a.m.

Suite 100
11555 Medlock Bridge Road
Johns Creek, Georgia

Frances Buono, RPR, CCR-B-791



1 not an opinion.

2 Q. (By Mr. Chachkes) Okay. Those are the
3 conclusions of your analysts?

4 A. Yes.

5 Q. Okay. You have personally never tested a
6 talc sample for asbestos from start to finish
7 yourself?

8 A. That is correct.

9 Q. You're not trained in using PLM for the
10 purposes of testing talc for asbestos?

11 MR. CIRSCH: Object to form.

12 THE WITNESS: I have not taken a PLM
13 course for asbestos.

14 Q. (By Mr. Chachkes) You've not published
15 any PLM methodologies?

16 A. No, sir. We're not using our
17 methodologies. We're using the standard protocol
18 methodologies. So if we were to publish -- when we
19 publish this, we would be publishing that this is the
20 method we used. That's like everybody else.

21 Q. Have you published any PLM work testing
22 for asbestos in any context?

23 A. Yes.

24 Q. What is it?

25 A. Our gasket study, our vermiculite studies,

1 our -- that have been published. A number of papers
2 are published where it's going to be a study on
3 exposure. You usually have to determine what the
4 concentration of asbestos is in the materials before
5 you publish that.

6 Q. Those are published in peer-reviewed
7 literature?

8 A. Yes, sir.

9 Q. Okay. But those are not finding asbestos
10 in talc; right?

11 A. No, sir. These are all construction
12 products.

13 Q. Are you an expert in PLM?

14 A. I think I know more than the average
15 layperson.

16 Q. Are you an expert in PLM?

17 MR. CIRSCH: Object to form.

18 THE WITNESS: Again, that's up to a judge
19 to be an expert.

20 I know how the analysis is done, I could
21 do an analysis if I -- it would take me a lot
22 longer than what people typically do.

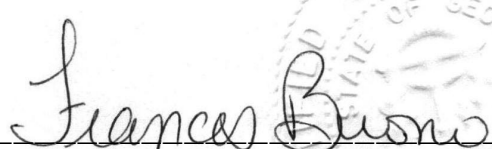
23 Q. (By Mr. Chachkes) One of the
24 disadvantages of PLM that you cite is that it cannot
25 resolve particles less than 1/2 micrometer; is that

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